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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KAYLA GAGNON and LAUREN COLON,

Plaintiffs,

v.

REVIVE HEALTH SENIOR CARE
MANAGEMENT, LLC, a domestic limited
liability company, doing business as ALTA
SKILLED NURSING AND
REHABILITATION CENTER; and DOES I-
XX inclusive,

Defendant.

Case No. 3:25-cv-00035-ART-CSD

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S DEADLINE TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFFS' FIRST AMENDED
COMPLAINT**

(First Request)

Defendant Revive Health Senior Care Management, LLC doing business as Alta Skilled Nursing and Rehabilitation Center ("Revive" or "Defendant") and Plaintiffs Kayla Gagnon and Lauren Colon ("Plaintiffs"), by and through their respective counsel of record, hereby agree, stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiffs' First Amended Complaint by 30 days, from May 6, 2025 to June 6, 2025.

While the Court previously granted extensions of the responsive pleading deadline for Plaintiff Gagnon's original Complaint, an Amended Complaint significantly revising the subject claims and adding Lauren Colon as a plaintiff was filed on April 22, 2025. This is the first request to extend the responsive pleading deadline for the Amended Complaint.

1 The parties request this extension for Defendant to answer or otherwise respond to the
2 Amended Complaint because the parties are actively engaging in global settlement discussions.
3 Counsel for Plaintiffs have provided a formal settlement demand to counsel for Defendant, and
4 Defendant is in the process of preparing its response. The undersigned represent that this stipulation
5 is not designed for purposes of delay.

6 Dated: May 6, 2025.

7 McDONALD CARANO LLP

JEPSEN LAW, PLLC

8 By: /s/ Daniel I. Aquino

By: /s/ Kendra J. Jepsen

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 7, 2025